

# MEMORANDUM ENDORSED

USDC SDNY  
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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/3/2021

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• ADMITTED IN FEDERAL AND  
NEW YORK STATE COURTS

June 3, 2021

Via ECF

Hon. Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Mansur Mohamed Surur*  
**1:19-cr-00338-GHW-3**

Dear Judge Woods:

I am CJA appointed counsel for Mansur Mohamed Surur who is charged with 18 U.S.C. 371.F., Conspiracy to Commit Wildlife Trafficking and related offenses in the above referenced matter.

I write to request approval for the appointment of A. James Bell, Esq. as associate counsel for the purpose of reviewing and summarizing discovery materials, as well as visiting and conferring with the client at the rate of \$90 per hour. Mr. Bell is an experienced attorney on the SDNY CJA Panel, has been appointed under the CJA and retained as lead counsel on numerous cases in the Southern and Eastern District of New York. He has extensive experience reviewing voluminous discovery in both electronic and document form, reviewing the same with the client and preparing legal memoranda and trial preparation. He would be a valuable addition to the defense and will result in significant cost savings to the Court.

I further submit that such appointment is necessary for the effective representation of this indigent defendant and is consistent with the statutory authority for the provision of ancillary services in an appointed case. Counsel specifically requests approval for an initial 100 hours at \$90 hours without prejudice to seeking authority for additional time should the review goes beyond the 100 hours.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

Respectfully submitted,

*Alain V. Massena* \_\_\_\_\_


Alain Massena, Esq.

Cc: All counsel, by ECF

Application granted. Defendant's request for approval for the appointment of A. James Bell as associate counsel, Dkt. No. 96, is granted. The Court approves an initial 100 hours at \$90 per hour. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 96.

SO ORDERED.

Dated: June 3, 2021  
New York, New York

  
GREGORY H. WOODS  
United States District Judge